

From: [Mascarenhas, Brendan](#)
To: [Bouchard, Andrew](#)
Subject: 114 Questions
Date: Wednesday, November 10, 2021 3:08:23 PM

Hi Andrew,

I wanted to run a couple quick questions by you on the HON 114 in advance of our discussion next week – first, would it be possible to share the list of facilities you are considering sending the 114 to? Also, did you have a timeframe in mind for responses? I know ethylene's 114 was 3 months, and there's a different timeline in play here, but was wondering if this might track that in some way given the anticipated similarity of the requests. Thanks a lot.

Regards,
Brendan

Brendan Mascarenhas | American Chemistry Council
Director, Regulatory and Technical Affairs
Brendan_Mascarenhas@americanchemistry.com
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From: [Mascarenhas, Brendan](#)
To: [Bouchard, Andrew](#)
Subject: 114s
Date: Wednesday, January 19, 2022 2:36:27 PM

Hi Andrew,

Sounds like you all have some items for distribution today – just heard the 114s went out. I was wondering, is it possible to get a generic/redacted copy that we can review as ACC for general awareness? It may help to inform suggestions, particularly from those members with experience on the ethylene MACT but may not be a recipient of the current 114. Thanks a lot.

Regards,
Brendan

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From: [Bouchard, Andrew](#)
To: [Emma Cheuse](#)
Subject: Chemical Sector CAA Section 114 ICR
Date: Thursday, January 27, 2022 10:21:00 AM

Hi Emma,

Last week, EPA sent out a CAA section 114 information collection request to eight entities to gather additional information about various NESHAP and NSPS that apply to chemical plants. A general copy of the request can be found on the web here: <https://www.epa.gov/stationary-sources-air-pollution/chemical-sector-clean-air-act-section-114-information-collection>. Let me know if you have any questions. Thanks!

Andrew Bouchard
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Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: [Bouchard, Andrew](#)
To: [Brenda Shine](#); [Lavoie, Tegan](#); [Jason Renzaglia](#); [Mascarenhas, Brendan](#)
Cc: [Gerri Garwood](#)
Subject: EPA/ACC Meeting on Chem Sector CAA Section 114 Request
Start: Wednesday, November 17, 2021 2:00:00 PM
End: Wednesday, November 17, 2021 3:00:00 PM
Location: Microsoft Teams Meeting

Microsoft Teams meeting

Join on your computer or mobile app

Click here to join the meeting <https://teams.microsoft.com/l/meetup-join/19%3ameeting_ZWlXMTc0MjltMzg1Ni00Nzc3LWl2MjEtZTgyZmQyNThkMTc4%40thread.v2/0?context=%7b%22Tid%22%3a%2288b378b3-6748-4867-acf9-76aacbeca6a7%22%2c%22Oid%22%3a%2275a33c30-f62f-442a-82ce-64845c76773f%22%7d>

Or call in (audio only)

(b) (6) United States, Raleigh

Phone Conference ID: (b) (6)

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From: [Mascarenhas, Brendan](#)
To: [Bouchard, Andrew](#)
Subject: Follow up on CAA 114
Date: Wednesday, December 1, 2021 3:06:58 PM

Hi Andrew,

Hope you're doing well. Thanks again for the time before the holiday to chat about the draft HON 114. We've been putting our heads together and have come up with a couple questions to run by you all based on that discussion. Do you have any availability early next week to discuss? If, next Monday (12/6) all day, next Tuesday (12/7) morning/early afternoon, and Wednesday (12/8) morning are open for us on this end. Thanks again.

Regards,
Brendan

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From: [Bouchard, Andrew](#)
To: [maureen.harbourt@keanmiller.com](#)
Cc: [wozniara@dow.com](#); [rickc@ftpc.fpcusa.com](#); [tandersen@fpcusa.com](#); [chris.moore@eastman.com](#); [beverly.douglas@basf.com](#); [Mary.Idlett@us.sasol.com](#); [kim.hoyt@us.indorama.net](#); [ed.l.gunderson@us.indorama.net](#); [scott_a_wagaman@huntsman.com](#); [Lassiter, Penny](#); [Cozzie, David](#); [Shine, Brenda](#); [Lavoie, Tegan](#); [Brendan_Mascarenhas@americanchemistry.com](#); [linda.brenneman@basf.com](#); [cmoreno3@dow.com](#); [bsago@eastman.com](#); [bob.stewart@kellyhart.com](#); [leo.guglielmi@us.indorama.net](#); [Kress, Heather \(HN\)](#); [tokesha@lca.org](#); [gammage@texaschemistry.org](#); [Elliott_Zenick@americanchemistry.com](#); [Lauren.Rucinski@keanmiller.com](#)
Subject: Follow-up on Chemical Sector CAA Section 114 ICR
Date: Thursday, March 17, 2022 4:52:00 PM

Hi Maureen,

In your March 3, 2022 petition, you mentioned that recipients of EPA's CAA section 114 ICR for the chemical sector are willing to work with the Agency to provide reasonable information necessary to undertake its regulatory reviews. Additionally, you also recognize that EPA has the authority to request the information sought in this ICR under its CAA section 114 authority. Based on our review of your petition and our recent discussions with you, we have identified the following three areas where you have the most concern: 1) Deadlines, 2) Confidential Business Information (CBI), and 3) the Paperwork Reduction Act (PRA). As discussed below, the Agency has considered the issues raised on these three items and is willing to amend our requests on these issues. We are also CC'ing contacts who received the CAA section 114 ICR for the chemical sector on this message as well as other contacts you have CC'd in more recent correspondence with the Agency to make them aware of these updates.

Issue 1 - Deadlines: We are extending the deadline for entities to respond to the CAA section 114 ICR for items due to the agency by March 21, 2022. Specifically, we are extending, until March 31, 2022, the deadline for entities to submit to EPA information that should generally be readily accessible for Component I. This consists of the following information: historical stack test emissions data, historical fenceline monitoring emissions data, copies of requested permits, and copies of any consent decrees for which a respondent is currently operating. We are also extending the deadline, until March 31, 2022, for respondents to provide a Fugitive Sampling Location Plan as required in Component II. The deadline for submitting all other information for Component I is extended to April 21, 2022. We are not extending the July 19, 2022 deadline for submittal of Component II information.

Issue 2 - CBI: We continue to believe that much of the requested data are emission data and thus not entitled to confidential treatment under section 114 of the CAA. In any event, should a respondent wish to claim any information in its submittal as CBI, it must at the time of submittal clearly identify such information and substantiate its CBI claims, including why such information is not "emission data," as defined under 40 CFR 2.301(a)(2)(i). A respondent making CBI claims is instructed to submit complete responses with information claimed to be CBI redacted and another complete response without redaction.

Issue 3 - PRA: While we don't fully agree with your characterization of the number of entities that are required to respond to this request, we are amenable to reducing the number of respondents while still ensuring we receive a fully representative data set for our reviews. Accordingly, Table 1 provides a revised list of entities who are still subject to the CAA section 114 ICR and must fully respond to our request. Table 2 provides a revised list of companies and facilities no longer required to respond this request.

Table 1. Revised List of Entities Required to Respond to CAA Section 114 ICR For the Chemical Sector

Entity No.	Entity (Separately Incorporated Subsidiary)	Facility Named in CAA section 114 Letter

1	BASF Corporation	BASF Corporation – Geismar Site
		BASF Corporation – Freeport Site
		BASF Corporation – DNT Plant
2	The Dow Chemical Company	The Dow Chemical Company – Louisiana Operations
		The Dow Chemical Company – Texas Operations
		The Dow Chemical Company – U.S.A, Midland
3	Eastman Chemical Company	Eastman Chemical Company – Texas Operations
		Eastman Chemical Company – Tennessee Operations
4	Formosa Plastics Corporation, Texas	Formosa Plastics Corporation – Point Comfort Plant
5	Huntsman Corporation	Huntsman Petrochemical – Conroe Plant
6	Indorama Ventures Oxides LLC	Indorama Ventures – Port Neches Operations
7	Sasol Chemicals (USA) LLC	Sasol Chemicals – Lake Charles Chemical Complex
8	Union Carbide Corporation	Union Carbide Corporation – Seadrift Operations
		Union Carbide Corporation – St. Charles Operations
		Union Carbide Corporation – Institute
		Union Carbide Corporation – South Charleston Plant
		Union Carbide Corporation – Texas City Operations

**Table 2. Revised List of Companies and Facilities No Longer Required to Respond to CAA
Section 114 ICR For the Chemical Sector**

Company	Facility Named in CAA section 114 Letter
BASF TotalEnergies Petrochemicals, LLC	BASF Corporation – NAFTA Region Olefins Complex
Eastman Chemical Texas City, Inc.	Eastman Chemical Company – Texas City Plant
Formosa Plastics Corporation, Louisiana	Formosa Plastics Corporation – Louisiana
Indorama Ventures (Oxides and Glycols) LLC	Indorama Ventures – Clear Lake Plant

If you have any questions about these items, please feel free to reach out to me.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
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Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

— Original Paper —
 P. van der Sluis, M. J. Brendel, M. Caraceni@americanchemistry.com • m.j.brendel@americanchemistry.com
 Sent: Tuesday, March 8, 2022 10:39 AM
 To: 'Brendel, M. J.' <m.j.brendel@americanchemistry.com>
 Subject: Fatty Acid Methyl Ester (FAME) Analysis of Poly(3-hydroxybutyrate) (PHB) and Poly(3-hydroxybutyrate-co-3-hydroxyvalerate) (PHBV) using Gas Chromatography-Mass Spectrometry (GC-MS)
 When Wednesday, May 4, 2022 10:11 PM, you wrote:
 When Wednesday, May 4, 2022 10:11 PM (UTC-06:00) Eastern Time (US & Canada):

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From: [Tony Germinario](#)
To: [Bouchard, Andrew](#)
Subject: Question re: HON RTR 114 Request Facility List
Date: Monday, December 27, 2021 1:12:10 PM
Attachments: [image001.png](#)

Hi Andrew,

One more site that I wanted to check with you whether you still wanted to include in list of facilities that will be receiving 114 info request.

BASF's North Geismar site may not be a good representative site for your purposes. While North Geismar does have one HON CMPU (Dinitrotoluene – "DNT"), EPA has little to gain by completing a 114 data gathering request. Background information is as follows:

- The North Geismar facility was originally owned and operated by Air Product as a minor source and not originally subject to the HON. It's current designation as "major" and subject to the HON is only because it was contiguous to BASF's Geismar site when BASF acquired ownership in 2006.
- DNT and Toluene are the only 2 HON-related HAPs used or produced by this unit. The unit (including LDAR components) does not emit EO, Chloroprene, 1,3 Butadiene, Vinyl Chloride, Ethylene Dichloride, which seems to be the primary goal of EPA's testing and fence line monitoring request.
- Emissions from the DNT CMPU are already vented to a thermal oxidizer, which should stand as MACT even if another technology review is conducted.
- The footprint of the North Geismar Site is bounded by Geismar Site to the west and south, and other industrial properties on the north and east.

Let me know what you think. Hate to waste effort gathering data for North Geismar if it won't be useful in EPA's analysis.

Thanks for your consideration.

Tony Germinario
N.A. Environmental Expert Services Manager

Phone: +1 973 245-6535, Mobile: +1-973-652-3430, Fax: +1 973 245-6707, Email:
tony.germinario@basf.com
Postal Address: , , 100 Park Avenue, Florham Park, NJ, USA



BASF Corporation

"We create value with our partners by caring for people and the environment"

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Wednesday, November 17, 2021 12:35 PM
To: Tony Germinario <tony.germinario@basf.com>
Subject: [EXT] RE: HON RTR 114 Request

Hi Tony,

Thanks for letting us know. I believe we had kept it on our draft list since the permit had some references to the HON equipment leak regs, but am assuming based on your email that is only a MON source and may just be complying with those requirements because MON points to them. We will go ahead and make that correction.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Tony Germinario <tony.germinario@basf.com>
Sent: Tuesday, November 16, 2021 4:26 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: HON RTR 114 Request

Hi Andrew,

ACC shared tentative list of which companies will be receiving 114 Info Requests. It included BASF's Cincinnati facility. This facility is not subject to the HON; it is subject to the MON. Should this be removed from the list?

Tony Germinario
N.A. Environmental Expert Services Manager

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BASF Corporation

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From: [Tony Germinario](#)
To: [Bouchard, Andrew](#)
Subject: Re: [EXT] RE: HON RTR 114 Request
Date: Wednesday, November 17, 2021 1:54:54 PM
Attachments: [image001.png](#)

Yes Andrew. Subject to MON and complying with the LDAR option from HON. Thanks.

Tony Germinario
N.A. Environmental Expert Services Manager

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tony.germinario@basf.com
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BASF Corporation

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From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Wednesday, November 17, 2021 12:34:42 PM
To: Tony Germinario <tony.germinario@basf.com>
Subject: [EXT] RE: HON RTR 114 Request

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From: [Tony Germinario](#)
To: [Bouchard, Andrew](#)
Subject: RE: [EXT] RE: Question re: HON RTR 114 Request Facility List
Date: Wednesday, January 5, 2022 11:01:24 AM
Attachments: [image001.png](#)

Ok thanks Andrew. Any update on the timing of getting the 114 Request?

Tony Germinario
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BASF Corporation

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From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Wednesday, January 5, 2022 9:02 AM
To: Tony Germinario <tony.germinario@basf.com>
Subject: [EXT] RE: Question re: HON RTR 114 Request Facility List

Hi Tony,

Thanks for the info. We are interested in gathering as much info as possible on various CMPUs since we are doing a review of the entire rule, not just a review of processes that contain those HAP. The 114 also focuses on a number of other rules such as SOCM I NSPS rules too, so it also focuses on VOC emissions. Suffice to say while there may be certain elements that can be ignored and that will ease the burden of you all responding to the request, we are interested in getting a response from this facility at this time.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Tony Germinario <tony.germinario@basf.com>

Sent: Monday, December 27, 2021 1:12 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: Question re: HON RTR 114 Request Facility List

Hi Andrew,

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From: [Bouchard, Andrew](#)
To: [Mascarenhas, Brendan](#)
Subject: RE: 114 Questions
Date: Monday, November 15, 2021 5:08:00 PM

Hi Brendan,

Sorry for getting back to you a few days late on this. I didn't see it until today as I was out of the office the later half of last week with the holiday and all. With respect to your question on timing, the current thinking for submittal is about 2 months for responses to the questionnaire and about 6 months for source testing/fenceline monitoring, which should align pretty well with the schedule we had for the EMACT CAA section 114 ICR. We also did have one additional item we wanted to ask some questions to you all on related to metal HAP emissions and sources of metal HAPs at these facilities (e.g. catalysts). So I'd propose as a rough agenda for our Wednesday call we go through the following items:

- List of Facilities and Regulations Under Review
- Questionnaire component of CAA section 114 ICR
- Source Testing component of CAA section 114 ICR
- Fenceline Monitoring component of CAA section 114 ICR
- Metal HAP emission sources (e.g., catalysts)

Lastly, here's our draft list of facilities we are thinking will send the Chemical Sector CAA section 114 information collection request to:

The Dow Chemical Company – 4 Facilities

- THE DOW CHEMICAL CO - LOUISIANA OPERATIONS (Plaquemine)
- DOW TEXAS OPERATIONS FREEPORT
- THE DOW CHEMICAL COMPANY U.S.A., MIDLAND
- DOW CHEMICAL CO. DALTON PLANT

Union Carbide Corporation – 5 Facilities

- UCC SEADRIFT OPERATIONS
- UNION CARBIDE CORP - ST CHARLES OPERATIONS
- UNION CARBIDE CORPORATION (Institute, WV)
- UNION CARBIDE CORP SOUTH CHARLESTON PLANT (WV)
- UNION CARBIDE TEXAS CITY

Formosa Plastics Corporation USA – 2 Facilities

- FORMOSA PLASTICS CORP LOUISIANA
- FORMOSA POINT COMFORT PLANT

Eastman Chemical Company – 3 Facilities

- EASTMAN CHEMICAL TEXAS OPERATIONS
- EASTMAN CHEMICAL COMPANY, TENNESSEE OPERATIONS
- EASTMAN CHEMICAL TEXAS CITY

BASF Corporation – 5 Facilities

- BASF CORP - GEISMAR SITE
- NAFTA REGION OLEFINS COMPLEX (Port Arthur)
- BASF FREEPORT SITE
- BASF CORP - DNT PLANT (Geismar)
- BASF CORP (Cincinnati)

Sasol Chemicals (USA) LLC – 1 Facility

- SASOL CHEMICALS (USA) LLC - LAKE CHARLES CHEMICAL COMPLEX

Indorama Ventures Oxides LLC – 2 Facilities

- Indorama (formerly HUNTSMAN PORT NECHES)
- CELANESE CLEAR LAKE PLANT (Indorama owns oxides unit here)

Huntsman Petrochemical LLC – 1 Facility

- HUNTSMAN PETROCHEMICAL CONROE PLANT

Let me know if you have any further questions. Thanks!

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
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Bouchard.Andrew@epa.gov

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Sent: Wednesday, November 10, 2021 3:08 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: 114 Questions

Hi Andrew,

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Regards,
Brendan

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Director, Regulatory and Technical Affairs

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From: [Mascarenhas, Brendan](#)
To: [Bouchard, Andrew](#)
Subject: RE: 114 Questions
Date: Tuesday, November 16, 2021 4:14:13 PM

Hi Andrew,

I had one question come up from a member that I wanted to run by you on the 114 facility list – it looks like a Corteva DCP plant is located on a Dow property. They are a separate source from Dow. Does this mean the 114 would not be applicable to the Corteva plant? Thanks for any help!

Regards,
Brendan

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From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Monday, November 15, 2021 5:08 PM
To: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Subject: RE: 114 Questions

Hi Brendan,

Sorry for getting back to you a few days late on this. I didn't see it until today as I was out of the office the later half of last week with the holiday and all. With respect to your question on timing, the current thinking for submittal is about 2 months for responses to the questionnaire and about 6 months for source testing/fenceline monitoring, which should align pretty well with the schedule we had for the EMACT CAA section 114 ICR. We also did have one additional item we wanted to ask some questions to you all on related to metal HAP emissions and sources of metal HAPs at these facilities (e.g. catalysts). So I'd propose as a rough agenda for our Wednesday call we go through the following items:

- List of Facilities and Regulations Under Review
- Questionnaire component of CAA section 114 ICR
- Source Testing component of CAA section 114 ICR
- Fenceline Monitoring component of CAA section 114 ICR
- Metal HAP emission sources (e.g., catalysts)

Lastly, here's our draft list of facilities we are thinking will send the Chemical Sector CAA section 114 information collection request to:

The Dow Chemical Company – 4 Facilities

- THE DOW CHEMICAL CO - LOUISIANA OPERATIONS (Plaquemine)
- DOW TEXAS OPERATIONS FREEPORT
- THE DOW CHEMICAL COMPANY U.S.A., MIDLAND
- DOW CHEMICAL CO. DALTON PLANT

Union Carbide Corporation – 5 Facilities

- UCC SEADRIFT OPERATIONS
- UNION CARBIDE CORP - ST CHARLES OPERATIONS
- UNION CARBIDE CORPORATION (Institute, WV)
- UNION CARBIDE CORP SOUTH CHARLESTON PLANT (WV)
- UNION CARBIDE TEXAS CITY

Formosa Plastics Corporation USA – 2 Facilities

- FORMOSA PLASTICS CORP LOUISIANA
- FORMOSA POINT COMFORT PLANT

Eastman Chemical Company – 3 Facilities

- EASTMAN CHEMICAL TEXAS OPERATIONS
- EASTMAN CHEMICAL COMPANY, TENNESSEE OPERATIONS
- EASTMAN CHEMICAL TEXAS CITY

BASF Corporation – 5 Facilities

- BASF CORP - GEISMAR SITE
- NAFTA REGION OLEFINS COMPLEX (Port Arthur)
- BASF FREEPORT SITE
- BASF CORP - DNT PLANT (Geismar)
- BASF CORP (Cincinnati)

Sasol Chemicals (USA) LLC – 1 Facility

- SASOL CHEMICALS (USA) LLC - LAKE CHARLES CHEMICAL COMPLEX

Indorama Ventures Oxides LLC – 2 Facilities

- Indorama (formerly HUNTSMAN PORT NECHES)
- CELANESE CLEAR LAKE PLANT (Indorama owns oxides unit here)

Huntsman Petrochemical LLC – 1 Facility

- HUNTSMAN PETROCHEMICAL CONROE PLANT

Let me know if you have any further questions. Thanks!

Andrew Bouchard

Environmental Engineer

U.S. Environmental Protection Agency

OAR/OAQPS/SPPD/RCG

Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Sent: Wednesday, November 10, 2021 3:08 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: 114 Questions

Hi Andrew,

I wanted to run a couple quick questions by you on the HON 114 in advance of our discussion next week – first, would it be possible to share the list of facilities you are considering sending the 114 to? Also, did you have a timeframe in mind for responses? I know ethylene's 114 was 3 months, and there's a different timeline in play here, but was wondering if this might track that in some way given the anticipated similarity of the requests. Thanks a lot.

Regards,
Brendan

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From: [Bouchard, Andrew](#)
To: [Mascarenhas, Brendan](#)
Subject: RE: 114s
Date: Thursday, January 20, 2022 3:18:00 PM

Hi Brendan,

Yes, the CAA section 114 information collection requests went out yesterday. We're working to get it posted to an EPA website. I'm out of the office tomorrow, so anticipate hopefully getting the generic request up early next week on the web and can ping you an email with the weblink when they're up. The only thing that's really different between requests is the formal letters and NEI files for review as they are company/site specific. Everything else is the same in the request.

Andrew Bouchard
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Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Sent: Wednesday, January 19, 2022 2:36 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: 114s

Hi Andrew,

Sounds like you all have some items for distribution today – just heard the 114s went out. I was wondering, is it possible to get a generic/redacted copy that we can review as ACC for general awareness? It may help to inform suggestions, particularly from those members with experience on the ethylene MACT but may not be a recipient of the current 114. Thanks a lot.

Regards,
Brendan

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From: [Bouchard, Andrew](#)
To: [Mascarenhas, Brendan](#)
Subject: RE: 114s
Date: Thursday, January 27, 2022 10:14:00 AM

Hi Brendan,

As you know, we sent a CAA section 114 information collection request last week to a number of entities. We have posted a copy of the general request on the web here:

<https://www.epa.gov/stationary-sources-air-pollution/chemical-sector-clean-air-act-section-114-information-collection>. Let me know if you have any questions. Thanks.

Andrew Bouchard
Environmental Engineer
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Bouchard.Andrew@epa.gov

From: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Sent: Thursday, January 20, 2022 4:09 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: RE: 114s

Hi Andrew,

That sounds great, thank you for the heads up. We'll keep a lookout for the link as well. By the way, any chance you guys have an update on the timeline for the MON reconsideration action? Thanks again!

Regards,
Brendan

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From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Thursday, January 20, 2022 3:19 PM
To: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Subject: RE: 114s

Hi Brendan,

Yes, the CAA section 114 information collection requests went out yesterday. We're working to get it posted to an EPA website. I'm out of the office tomorrow, so anticipate hopefully getting the generic request up early next week on the web and can ping you an email with the weblink when they're up. The only thing that's really different between requests is the formal letters and NEI files for review as they are company/site specific. Everything else is the same in the request.

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Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Sent: Wednesday, January 19, 2022 2:36 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: 114s

Hi Andrew,

Sounds like you all have some items for distribution today – just heard the 114s went out. I was wondering, is it possible to get a generic/redacted copy that we can review as ACC for general awareness? It may help to inform suggestions, particularly from those members with experience on the ethylene MACT but may not be a recipient of the current 114. Thanks a lot.

Regards,
Brendan

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From: [Bouchard, Andrew](#)
To: [Emma Cheuse](#)
Cc: akron@earthjustice.org; kriley@earthjustice.org
Bcc: [Brenda Shine](#)
Subject: RE: Chemical Sector CAA Section 114 ICR
Date: Tuesday, February 8, 2022 2:51:00 PM

Hi Emma,

I will certainly pass along your email to others here in my group who helped with this effort. As for your question about the final list of entities that received the request, these include:

- 1) BASF Corporation – Geismar Site (Geismar, LA); NAFTA Region Olefins Complex (Port Arthur, TX); Freeport Site (Freeport, TX); and DNT Plant (Geismar, LA)
- 2) The Dow Chemical Company – Louisiana Operations (Plaquemine, LA); Texas Operations (Freeport, TX); and Midland Plant (Midland, MI)
- 3) Eastman Chemical Company – Texas Operations (Longview, TX); Tennessee Operations (Kingsport, TN); and Texas City Plant (Texas City, TX)
- 4) Formosa Plastics Corporation, U.S.A. – Louisiana Plant (Baton Rouge, LA) and Point Comfort Plant (Point Comfort, TX)
- 5) Huntsman Petrochemical – Conroe Plant (Conroe, TX)
- 6) Indorama Ventures – Port Neches Operations (Port Neches, TX) and Clear Lake Plant (Pasadena, TX)
- 7) Sasol Chemicals (U.S.A.) – Lake Charles Complex (Westlake, LA)
- 8) Union Carbide Corporation – Seadrift Operations (Seadrift, TX); St. Charles Operations (Taft, LA); Institute Plant (Institute, WV); South Charleston Plant (South Charleston, WV); and Texas City Operations (Texas City, TX)

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Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Emma Cheuse <echeuse@earthjustice.org>
Sent: Thursday, February 3, 2022 12:02 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Cc: akron@earthjustice.org; kriley@earthjustice.org
Subject: RE: Chemical Sector CAA Section 114 ICR

Andrew – thank you very much for sending this along to us.

It is wonderful to see this ICR go out. Please convey my personal appreciation to the team working

on this for the effort you and they have applied and are continuing to put into this information collection process.

Could you please let us know the final list of entities and facilities this was sent to/covers, or point us to a place we can find that online? We also would be grateful if EPA could post online or share the sampling plans and results from this ICR as soon as possible, as those come in this spring and summer.

Feel free to call me, Adam or Kathleen if helpful to discuss by phone.

Thank you.

Very best regards,
Emma

Emma Cheuse
Senior Attorney
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(she/her/hers)



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From: Bouchard, Andrew <bouchard.andrew@epa.gov>
Sent: Thursday, January 27, 2022 10:21 AM
To: Emma Cheuse <echeuse@earthjustice.org>
Subject: Chemical Sector CAA Section 114 ICR

Hi Emma,

Last week, EPA sent out a CAA section 114 information collection request to eight entities to gather additional information about various NESHAP and NSPS that apply to chemical plants. A general copy of the request can be found on the web here: <https://www.epa.gov/stationary-sources-air->

[pollution/chemical-sector-clean-air-act-section-114-information-collection](#). Let me know if you have any questions. Thanks!

Andrew Bouchard
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Bouchard.Andrew@epa.gov

From: [Bouchard, Andrew](#)
To: [Tony Germinario](#)
Subject: RE: HON RTR 114 Request
Date: Wednesday, November 17, 2021 12:34:00 PM
Attachments: [image001.png](#)

Hi Tony,

Thanks for letting us know. I believe we had kept it on our draft list since the permit had some references to the HON equipment leak regs, but am assuming based on your email that is only a MON source and may just be complying with those requirements because MON points to them. We will go ahead and make that correction.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Tony Germinario <tony.germinario@basf.com>
Sent: Tuesday, November 16, 2021 4:26 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: HON RTR 114 Request

Hi Andrew,

ACC shared tentative list of which companies will be receiving 114 Info Requests. It included BASF's Cincinnati facility. This facility is not subject to the HON; it is subject to the MON. Should this be removed from the list?

Tony Germinario
N.A. Environmental Expert Services Manager

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tony.germinario@basf.com
Postal Address: , , 100 Park Avenue, Florham Park, NJ, USA



BASF Corporation

"We create value with our partners by caring for people and the environment"

From: [Bouchard, Andrew](#)
To: [Mascarenhas, Brendan](#)
Subject: RE: HON
Date: Thursday, November 4, 2021 7:59:00 PM

Hi Brendan,

Thanks for the quick chat today. As I mentioned on the phone, I think we are still interested in talking about your issues with EMACT and MON, but believe that the CAA section 114 request we have been putting together for various chemical sector rules is probably a more pressing issue we should chat with you all about. Looking at our calendars, it looks like we have time available on Nov 17 from 9 AM - 10 AM, 2 PM - 3 PM, or 3 PM - 4 PM. Does one of these work best for you all? We are thinking that we will send the request to 8 entities (given that Denka already received a section 114 request and is subject to the HON and P&R I, which is part of this request. Other rules we are seeking info on include PEPOs and the SOCMI NSPS rules). The 8 entities we are thinking will likely receive the request include The Dow Chemical Company, Union Carbide Corporation, Formosa Plastics Corporation USA, Eastman Chemical Company, BASF Corporation, Sasol Chemicals (USA) LLC, Indorama Ventures Oxides LLC, and Huntsman Petrochemical LLC, so they may have a more vested interest in being on the call. Just let me know if you all have preference in time that day or we should look for some time on another day.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Sent: Wednesday, November 3, 2021 5:35 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: HON

Hi Andrew,

Hope all is well with you. I wanted to quickly let you know that I gave our members until Thanksgiving week to provide me feedback on the HON RTR facility list. From there, I will turn it around quickly and send it back to you. Please let me know if that timeline should be adjusted back or forward depending on your schedule.

Also, on the matter of scheduling, we wanted to get some time on your calendar to flag a couple issues related to the EMACT and MON RTR petitions for reconsideration. I know you said you are continuing to review them. Given the upcoming compliance deadlines, some of our members were hoping to have the opportunity to reinforce a couple of the issues raised in each petition and answer any questions you may have. If it works for you, we have availability during the first part of the week

of Nov. 15th. Anytime you had in there would be appreciated. Thanks again.

Regards,
Brendan

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From: [Bouchard, Andrew](#)
To: [Tony Germinario](#)
Subject: RE: Question re: HON RTR 114 Request Facility List
Date: Wednesday, January 5, 2022 9:02:00 AM
Attachments: [image001.png](#)

Hi Tony,

Thanks for the info. We are interested in gathering as much info as possible on various CMPUs since we are doing a review of the entire rule, not just a review of processes that contain those HAP. The 114 also focuses on a number of other rules such as SO2 NSPS rules too, so it also focuses on VOC emissions. Suffice to say while there may be certain elements that can be ignored and that will ease the burden of you all responding to the request, we are interested in getting a response from this facility at this time.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
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Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Tony Germinario <tony.germinario@basf.com>
Sent: Monday, December 27, 2021 1:12 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: Question re: HON RTR 114 Request Facility List

Hi Andrew,

One more site that I wanted to check with you whether you still wanted to include in list of facilities that will be receiving 114 info request.

BASF's North Geismar site may not be a good representative site for your purposes. While North Geismar does have one HON CMPU (Dinitrotoluene – "DNT"), EPA has little to gain by completing a 114 data gathering request. Background information is as follows:

- The North Geismar facility was originally owned and operated by Air Product as a minor source and not originally subject to the HON. It's current designation as "major" and subject to the HON is only because it was contiguous to BASF's Geismar site when BASF acquired ownership in 2006.
- DNT and Toluene are the only 2 HON-related HAPs used or produced by this unit. The unit (including LDAR components) does not emit EO, Chloroprene, 1,3 Butadiene, Vinyl Chloride, Ethylene Dichloride, which seems to be the primary goal of EPA's testing and fence line monitoring request.
- Emissions from the DNT CMPU are already vented to a thermal oxidizer, which should stand as MACT even if another technology review is conducted.
- The footprint of the North Geismar Site is bounded by Geismar Site to the west and south,

and other industrial properties on the north and east.

Let me know what you think. Hate to waste effort gathering data for North Geismar if it won't be useful in EPA's analysis.

Thanks for your consideration.

Tony Germinario
N.A. Environmental Expert Services Manager

Phone: +1 973 245-6535, Mobile: +1-973-652-3430, Fax: +1 973 245-6707, Email:

tony.germinario@basf.com

Postal Address: , , 100 Park Avenue, Florham Park, NJ, USA



BASF Corporation

"We create value with our partners by caring for people and the environment"

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>

Sent: Wednesday, November 17, 2021 12:35 PM

To: Tony Germinario <tony.germinario@basf.com>

Subject: [EXT] RE: HON RTR 114 Request

Hi Tony,

Thanks for letting us know. I believe we had kept it on our draft list since the permit had some references to the HON equipment leak regs, but am assuming based on your email that is only a MON source and may just be complying with those requirements because MON points to them. We will go ahead and make that correction.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Tony Germinario <tony.germinario@basf.com>

Sent: Tuesday, November 16, 2021 4:26 PM

To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>

Subject: HON RTR 114 Request

Hi Andrew,

ACC shared tentative list of which companies will be receiving 114 Info Requests. It included BASF's Cincinnati facility. This facility is not subject to the HON; it is subject to the MON. Should this be removed from the list?

Tony Germinario

N.A. Environmental Expert Services Manager

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tony.germinario@basf.com

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We create chemistry

BASF Corporation

"We create value with our partners by caring for people and the environment"

From: Wozniak, Russell (RA)
To: Bouchard, Andrew
Cc: Lavoie, Tegan
Subject: RE: Source Listing for Future HON PEPO and P&R I
Date: Tuesday, November 16, 2021, 6:50:56 PM

Andrew

Answers to your questions below:

Pittsburg, CA – This site was transferred to Corteva in 2019. Corteva is a new Ag Science Company that was formed in 2019 as part of the Dow/Dupont merger, which resulted in a split into 3 companies (Dow, Dupont, and Corteva).

Beaumont, TX Ani line Facility – Dow did acquire this facility from Chemours a few years ago. I believe that it is the following facility in the source file:

EIS ID	FRS ID	Facility Name	Street	City	County	Zipcode	State	Region	HON	PEPO	P&R 1
6386311, 6362111, 17912111, 4017311	110034393378	CHEMOURS BEAUMONT ANILINE FACILITY	5470 N TWIN CITY HWY	BEAUMONT	Jefferson County	77705-	TX	RO6	Y		

One potential note of interest for the Beaumont Aniline facility – We may consider converting this site to an area HAP emission source in the future.

Regards,

Russell A. Wozniak
Dow
US Air Advocacy Leader & California Regulatory Affairs Leader
Environmental Expertise/Regulatory Affairs
Cell Phone 361-571-5420
Office Phone 361-553-2920

General Business

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Tuesday, November 16, 2021, 3:21 PM
To: Wozniak, Russell (RA) <wozniara@dow.com>
Cc: Lavoie, Tegan <lavoie.tegan@epa.gov>
Subject: RE: Source Listing for Future HON PEPO and P&R I

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Thanks for the info Russell. I did have one follow-up item for you as well while we're on the topic of Dow facilities and chemical sector NESHAP applicability. We were trying to find out some more info on the following two facilities: DOW BEAUMONT ANILINE Facility in Nederland, TX and the DOW CHEMICAL COMPANY Facility in Pittsburg, CA. Are these sources still under your ownership and subject to the rules we are concerned with here?

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Wozniak, Russell (RA) <wozniara@dow.com>
Sent: Tuesday, November 16, 2021, 1:27 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: Source Listing for Future HON PEPO and P&R I

Andrew

Brendan from ACC forwarded this list of Dow and Union Carbide sites that may receive the future Section 114 request.

Thus, I wanted to provide some feedback on a few of these sites:

Dow Chemical – Midland – I'm still checking, but after our merger and split with Dupont in 2019, I'm not sure that we have any facilities that are subject to HON, PEPO, or P&R I at Midland, MI anymore. The P&R I facilities in Midland, MI are now owned by Trinseo. Dupont, or Corteva (new Ag company formed from the merger/split). Dow still has some manufacturing at Midland, MI, but it is primarily the former Dow Corning facilities (silicones, etc.).

Dow Chemical Dalton, GA – Dow does not own this site anymore. The owner/operator is a company named Trinseo.

Union Carbide – Institute, WV – Dow/Union Carbide does not own this site anymore. The site is an industrial park that is owned by Altivia, and multiple companies have some operations there. Dow/UCC does own and operate an ethylene oxide unloading facility and a flare system there. The Polyoxy plant at Institute, WV is now owned by International Flavors & Fragrances (IFF).

1. Dow Chemical Company
 - a. THE DOW CHEMICAL CO. - LOUISIANA OPERATIONS (Plaquemine)
 - b. DOW TEXAS OPERATIONS FREEPORT
 - c. THE DOW CHEMICAL COMPANY U.S.A. MIDLAND
 - d. DOW CHEMICAL CO. DALTON PLANT
2. Union Carbide Corporation
 - a. UCC SEADRIFT OPERATIONS
 - b. UNION CARBIDE CORP. - ST CHARLES OPERATIONS
 - c. UNION CARBIDE CORPORATION (Institute, WV)
 - d. UNION CARBIDE CORP. SOUTH CHARLESTON PLANT (WV)
 - e. UNION CARBIDE TEXAS CITY

Regards,

Russell A. Wozniak
Dow
US Air Advocacy Leader & California Regulatory Affairs Leader
Environmental Expertise/Regulatory Affairs
Cell Phone 361-571-5420
Office Phone 361-553-2920

General Business

From: Wozniak, Russell (RA)
To: Bouchard, Andrew
Cc: Lavoie, Tegan
Subject: RE: Source Listing for Future HON PEPO and P&R I
Date: Wednesday, November 17, 2021 5:04:56 PM

Andrew

I wanted to provide some additional follow-up information:

Midland MI site – I did confirm that we don't own/operate any facilities that are subject to the HON PEPO or P&R I rules.

The site does have an incinerator on-site that is a control device (i.e. takes some vents from facilities that are subject to the HON rule that are owned/operated by other companies at the site). Thus, we would only be able to report on the operation of the emission control device at Midland MI.

Fenceline Monitoring – These updates are probably in EPA's Emission Inventory files, but Olin Corporation actually owns the plants that produce EDC and vinyl chloride at our Freeport TX and Plaquemine LA sites as of 2015. Thus, Olin really should be the entity to cover any fenceline measurements of these materials.

Regards,

Russell A. Wozniak
Dow
US Air Advocacy Leader & California Regulatory Affairs Leader
Environmental Expertise/Regulatory Affairs
Cell Phone 361-571-5420
Office Phone 361-553-2920

General Business

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Wednesday, November 17, 2021 12:47 PM
To: Wozniak, Russell (RA) <wozniara@dow.com>
Cc: Lavoie, Tegan <lavoie.tegan@epa.gov>
Subject: RE: Source Listing for Future HON PEPO and P&R I

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Thanks for the quick follow-up, Russell.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Wozniak, Russell (RA) <wozniara@dow.com>
Sent: Tuesday, November 16, 2021 6:51 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Cc: Lavoie, Tegan <lavoie.tegan@epa.gov>
Subject: RE: Source Listing for Future HON PEPO and P&R I

Andrew

Answers to your questions below:

Pittsburg, CA – This site was transferred to Corteva in 2019. Corteva is a new Ag Science Company that was formed in 2019 as part of the Dow/Dupont merger, which resulted in a split into 3 companies (Dow, Dupont, and Corteva).

Beaumont, TX Aniline Facility – Dow did acquire this facility from Chemours a few years ago. I believe that it is the following facility in the source file:

EIS ID	FRS ID	Facility Name	Street	City	County	Zipcode	State	Region	HON	PEPO	P&R I
6386311, 6362111, 17912111, 4017311	110034393378	CHEMOURS BEAUMONT ANILINE FACILITY	5470 N TWIN CITY HWY	BEAUMONT	Jefferson County	77705-	TX	RO6	Y		

One potential note of interest for the Beaumont Aniline facility – We may consider converting this site to an area HAP emission source in the future.

Regards,

Russell A. Wozniak
Dow
US Air Advocacy Leader & California Regulatory Affairs Leader
Environmental Expertise/Regulatory Affairs
Cell Phone 361-571-5420
Office Phone 361-553-2920

General Business

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Tuesday, November 16, 2021 3:21 PM
To: Wozniak, Russell (RA) <wozniara@dow.com>
Cc: Lavoie, Tegan <lavoie.tegan@epa.gov>
Subject: RE: Source Listing for Future HON PEPO and P&R I

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks for the info, Russell. I did have one follow-up item for you as well while we're on the topic of Dow facilities and chemical sector NESHA applicability. We were trying to find out some more info on the following two facilities: DOW BEAUMONT ANILINE Facility in Nederland, TX and the DOW CHEMICAL COMPANY Facility in Pittsburg, CA. Are these sources still under your ownership and subject to the rules we are concerned with here?

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Wozniak, Russell (RA) <wozniara@dow.com>
Sent: Tuesday, November 16, 2021 1:27 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: Source Listing for Future HON PEPO and P&R I

Andrew

Brendan from ACC forwarded this list of Dow and Union Carbide sites that may receive the future Section 114 request.

Thus, I wanted to provide some feedback on a few of these sites:

Dow Chemical – Midland – I'm still checking, but after our merger and split with Dupont in 2019, I'm not sure that we have any facilities that are subject to HON PEPO or P&R I at Midland, MI anymore.

The P&R I facilities in Midland, MI are now owned by Trinseo, Dupont, or Corteva (new Ag company formed from the merger/split). Dow still has some manufacturing at Midland, MI, but it is primarily the former Dow Corning facilities (silicones, etc.).

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Union Carbide – Institute, WV – Dow/Union Carbide does not own this site anymore. The site is an industrial park that is owned by Altivia, and multiple companies have some operations there. Dow/UCC does own and operate an ethylene oxide unloading facility and a flare system there. The Polycarb plant at Institute, WV, is now owned by International Flavors & Fragrances (IFF).

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 - a. THE DOW CHEMICAL CO - LOUISIANA OPERATIONS (Plaquemine)
 - b. DOW TEXAS OPERATIONS FREEPORT
 - c. THE DOW CHEMICAL COMPANY U.S.A. MIDLAND
 - d. DOW CHEMICAL CO. DALTON PLANT
2. Union Carbide Corporation
 - a. UCC SEADRIFT OPERATIONS
 - b. UNION CARBIDE CORP - ST CHARLES OPERATIONS
 - c. UNION CARBIDE CORPORATION (Institute WV)
 - d. UNION CARBIDE CORP SOUTH CHARLESTON PLANT (WV)
 - e. UNION CARBIDE TEXAS CITY

Regards,

Russell A. Wozniak

Dow

US Air Advocacy Leader & California Regulatory Affairs Leader

Environmental Expertise/Regulatory Affairs

Cell Phone 361-571-5420

Office Phone 361-553-2920

General Business

From: [Mascarenhas, Brendan](#)
To: [Bouchard, Andrew](#)
Subject: RE: Updated HON Contact List
Date: Thursday, January 13, 2022 10:22:25 AM

Hi Andrew,

I just heard back from Russell and he gave me the same address you have on file. Thanks very much!

Regards,
Brendan

Brendan Mascarenhas | American Chemistry Council
Director, Regulatory and Technical Affairs
Brendan_Mascarenhas@americanchemistry.com
700 2nd Street NE | Washington, D.C. | 20002
O: (202) 249-6423 | C: (703) 989-5269
www.americanchemistry.com

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Thursday, January 13, 2022 10:10 AM
To: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Subject: RE: Updated HON Contact List

Thanks Brendan. I have Russell's mailing address from when we did the EMACT 114. Hoping it's the same, but let me know if you hear back from him. I have it as:

Seadrift Operations
P.O. Box 186
Port Lavaca, TX 77979

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Sent: Wednesday, January 12, 2022 5:26 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: RE: Updated HON Contact List

Hi Andrew,

Some updates to the list, copied again below. Edits in red. I'm anticipating a response from Russell soon, and if he does send something, I'll get back to you asap. In the meantime, let me know if there's anything else. Thanks a lot.

- Dow Chemical Company
 - Contact: Russell Wozniak, wozniara@dow.com, (361) 553-2920
 - US Air Advocacy Leader & California Regulatory Affairs Leader; Environmental Expertise/Regulatory Affairs
 - Address to be updated
- Union Carbide Corporation
 - Contact: Russell Wozniak, wozniara@dow.com, (361) 553-2920
- Formosa Plastics Corporation USA
 - Contact: Rick Crabtree, rickc@ftpc.fpcusa.com, (361) 987-7280
 - General Manager, Formosa Plastics TX
 - 201 Formosa Drive, Point Comfort TX 77978
 - One additional request – if a CC is allowed, could you please also send to:
 - Thomas S. Andersen (tandersen@fpcusa.com)
 - Corporate Environmental Director Formosa Plastics Corporation, U.S.A.
 - 9 Peach Tree Hill Road, Livingston, NJ 07039
- Eastman Chemical Company
 - Contact: Chris Moore, chris.moore@eastman.com, (865) 414-5061
 - Global Environmental Advocacy Manager, Eastman Chemical Company
 - P.O. Box 511
 - Kingsport, Tennessee 37662
- BASF Corporation
 - Contact: Beverly Douglas, beverly.douglas@basf.com, (979) 236-7490
 - Environmental Expert Services
 - BASF Corporation, 8531 NE Cornell Rd., Suite B300, Hillsboro, OR 97124, United States
- Sasol Chemicals (USA) LLC
 - Contact: TBD
- Indorama Ventures Oxides LLC
 - Contact: Kimberly Hoyt, kim.hoyt@us.indorama.net, (409) 723-3261
 - Site Director, Indorama Ventures Oxides and Derivatives, Port Neches Operations
 - P.O Box 847
 - 2701 Spur 136, Port Neches, Texas 77651
 - One additional request – if a CC is allowed, could you please also send to:
 - Edward L. Gunderson (ed.l.gunderson@us.indorama.net)
 - Senior Manager, EHS Legal
 - 24 Waterway Ave, The Woodlands, TX 77380
- Huntsman Petrochemical LLC
 - Contact: Scott Wagaman, scott_a_wagaman@huntsman.com, (281) 719-3038
 - Manager – Special Environmental Projects

- Huntsman Advanced Technology Center
- 8600 Gosling Road, The Woodlands, Texas 77381

Brendan Mascarenhas | American Chemistry Council
Director, Regulatory and Technical Affairs
Brendan_Mascarenhas@americanchemistry.com
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www.americanchemistry.com

From: Mascarenhas, Brendan
Sent: Monday, January 10, 2022 5:25 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: Re: Updated HON Contact List

Hi Andrew,

Understood, that sounds good. I'll get you an update either way by this Wednesday. Thanks very much.

Regards,
Brendan

On Jan 10, 2022, at 5:21 PM, Bouchard, Andrew <Bouchard.Andrew@epa.gov> wrote:

Hi Brendan,

The sooner the better would be great since we are trying to get this request out here fairly quickly. But no worries if you can't get it to me in a short turnaround time. We can adjust the letter since it will be emailed.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>

Sent: Monday, January 10, 2022 5:03 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: RE: Updated HON Contact List

Hi Andrew,

Sure thing, I will run down some titles and addresses to add to the list. Is there a date that I should aim to send them by? I don't anticipate many issues, but sometimes it takes a day or so for members to get back to me. Thanks very much.

Regards,
Brendan

Brendan Mascarenhas | American Chemistry Council
Director, Regulatory and Technical Affairs
Brendan_Mascarenhas@americanchemistry.com
700 2nd Street NE | Washington, D.C. | 20002
O: (202) 249-6423 | C: (703) 989-5269
www.americanchemistry.com

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Monday, January 10, 2022 4:46 PM
To: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Subject: RE: Updated HON Contact List

Hi Brendan,

One quick question for you. Do you have a formal title and physical mailing address by chance for everyone? No worries if not since we plan on sending the request via email, but our typical letters we send have us put this information upfront on the formal letter we send.

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Sent: Wednesday, January 5, 2022 2:40 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: Updated HON Contact List

Hi Andrew,

One additional change to the HON contact list for BASF. I incorporated it below:

- Dow Chemical Company
 - Contact: Russell Wozniak, wozniara@dow.com, (361) 553-2920
- Union Carbide Corporation
 - Contact: Russell Wozniak, wozniara@dow.com, (361) 553-2920
- Formosa Plastics Corporation USA
 - Contact: Rick Crabtree, rickc@ftpc.fpcusa.com, (361) 987-7280
- Eastman Chemical Company
 - Contact: Chris Moore, chris.moore@eastman.com, (865) 414-5061
- BASF Corporation
 - Contact: Beverly Douglas, beverly.douglas@basf.com, (979) 236-7490
- Sasol Chemicals (USA) LLC
 - Contact: TBD
- Indorama Ventures Oxides LLC
 - Contact: Kimberly Hoyt, kim.hoyt@us.indorama.net, (409) 723-3261
- Huntsman Petrochemical LLC
 - Contact: Scott Wagaman, scott_a_wagaman@huntsman.com, (281) 719-3038

Thanks again.

Regards,
Brendan

Brendan Mascarenhas | American Chemistry Council

Director, Regulatory and Technical Affairs

Brendan_Mascarenhas@americanchemistry.com

700 2nd Street NE | Washington, D.C. | 20002

O: (202) 249-6423 | C: (703) 989-5269

www.americanchemistry.com

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>

Sent: Monday, January 3, 2022 4:41 PM

To: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>

Subject: RE: Follow-up Items

Got it, thanks!

Andrew Bouchard
Environmental Engineer

U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Sent: Tuesday, December 28, 2021 6:29 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: RE: Follow-up Items

Hi Andrew,

One change to the Formosa contact, incorporated below. Thanks again.

Regards,
Brendan

Brendan Mascarenhas | American Chemistry Council
Director, Regulatory and Technical Affairs
Brendan_Mascarenhas@americanchemistry.com
700 2nd Street NE | Washington, D.C. | 20002
O: (202) 249-6423 | C: (703) 989-5269
www.americanchemistry.com

From: Mascarenhas, Brendan
Sent: Tuesday, December 21, 2021 5:19 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: RE: Follow-up Items

Hi Andrew,

Hope all is well. As we discussed, please see attached for the HON facility list with some corrections from ACC members. We may have an additional item or two from some other companies that are not ACC members, i.e., Formosa Plastics. I have also included below some preliminary contacts for the companies you listed. We hope to get Sasol's contact soon, and I will keep you posted as we do. In the meantime, if you need anything else, please feel free to let me know. Thanks a lot.

- Dow Chemical Company
 - Contact: Russell Wozniak, wozniara@dow.com, (361) 553-2920
- Union Carbide Corporation
 - Contact: Russell Wozniak, wozniara@dow.com, (361) 553-2920
- Formosa Plastics Corporation USA
 - Contact: Rick Crabtree, rickc@ftpc.fpcusa.com, (361) 987-7280
- Eastman Chemical Company

- Contact: Chris Moore, chris.moore@eastman.com, (865) 414-5061
- BASF Corporation
 - Contact: Daniel Wolf, daniel.wolf@basf.com, (225) 339-2774
- Sasol Chemicals (USA) LLC
 - Contact: TBD
- Indorama Ventures Oxides LLC
 - Contact: Kimberly Hoyt, kim.hoyt@us.indorama.net, (409) 723-3261
- Huntsman Petrochemical LLC
 - Contact: Scott Wagaman, scott_a_wagaman@huntsman.com, (281) 719-3038

Regards,
Brendan

Brendan Mascarenhas | American Chemistry Council

Director, Regulatory and Technical Affairs

Brendan_Mascarenhas@americanchemistry.com

700 2nd Street NE | Washington, D.C. | 20002

O: (202) 249-6423 | C: (703) 989-5269

www.americanchemistry.com

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>

Sent: Wednesday, December 8, 2021 10:58 AM

To: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>

Subject: Follow-up Items

Hi Brendan

A couple of follow-up items for you. First, I wanted to check-in with you on the status of the facility list review to see when we might have comments back from you all? Second, for the eight entities we are planning to send the CAA section 114 request to, is there a preferred list of company contacts and their contact info (email and phone #) who we should address the requests to? As a reminder, the requests will be going to the following entities: The Dow Chemical Company, Union Carbide Corporation, Formosa Plastics Corporation USA, Eastman Chemical Company, BASF Corporation, Sasol Chemicals (USA) LLC, Indorama Ventures Oxides LLC, and Huntsman Petrochemical LLC.

Lastly, I'm attaching a copy of the OAR letter Elliott had inquired about getting a copy of at the meeting this morning.

Andrew Bouchard
Environmental Engineer

U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

+++++

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From: [Wozniak, Russell \(RA\)](#)
To: [Bouchard, Andrew](#)
Subject: Source Listing for Future HON, PEPO, and P&R I
Date: Tuesday, November 16, 2021 1:27:29 PM

Andrew,

Brendan from ACC forwarded this list of Dow and Union Carbide sites that may receive the future Section 114 request.

Thus, I wanted to provide some feedback on a few of these sites:

Dow Chemical – Midland – I’m still checking, but after our merger and split with Dupont in 2019, I’m not sure that we have any facilities that are subject to HON, PEPO, or P&R I at Midland, MI anymore. The P&R 1 facilities in Midland, MI are now owned by Trinseo, Dupont, or Corteva (new Ag company formed from the merger/split). Dow still has some manufacturing at Midland, MI, but it is primarily the former Dow Corning facilities (silicones etc.).

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 - a. THE DOW CHEMICAL CO - LOUISIANA OPERATIONS (Plaquemine)
 - b. DOW TEXAS OPERATIONS FREEPORT
 - c. THE DOW CHEMICAL COMPANY U.S.A., MIDLAND
 - d. DOW CHEMICAL CO. DALTON PLANT
2. Union Carbide Corporation
 - a. UCC SEADRIFT OPERATIONS
 - b. UNION CARBIDE CORP - ST CHARLES OPERATIONS
 - c. UNION CARBIDE CORPORATION (Institute, WV)
 - d. UNION CARBIDE CORP SOUTH CHARLESTON PLANT (WV)
 - e. UNION CARBIDE TEXAS CITY

Regards,

Russell A. Wozniak

Dow

US Air Advocacy Leader & California Regulatory Affairs Leader

Environmental Expertise/Regulatory Affairs

Cell Phone 361-571-5420

Office Phone 361-553-2920

General Business

From: [Mascarenhas, Brendan](#)
To: [Bouchard, Andrew](#)
Subject: Updated HON Contact List
Date: Wednesday, January 5, 2022 2:40:28 PM

Hi Andrew,

One additional change to the HON contact list for BASF. I incorporated it below:

- Dow Chemical Company
 - Contact: Russell Wozniak, wozniara@dow.com, (361) 553-2920
- Union Carbide Corporation
 - Contact: Russell Wozniak, wozniara@dow.com, (361) 553-2920
- Formosa Plastics Corporation USA
 - Contact: Rick Crabtree, rickc@ftpc.fpcusa.com, (361) 987-7280
- Eastman Chemical Company
 - Contact: Chris Moore, chris.moore@eastman.com, (865) 414-5061
- BASF Corporation
 - Contact: Beverly Douglas, beverly.douglas@basf.com, (979) 236-7490
- Sasol Chemicals (USA) LLC
 - Contact: TBD
- Indorama Ventures Oxides LLC
 - Contact: Kimberly Hoyt, kim.hoyt@us.indorama.net, (409) 723-3261
- Huntsman Petrochemical LLC
 - Contact: Scott Wagaman, scott_a_wagaman@huntsman.com, (281) 719-3038

Thanks again.

Regards,
Brendan

Brendan Mascarenhas | American Chemistry Council
Director, Regulatory and Technical Affairs
Brendan_Mascarenhas@americanchemistry.com
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O: (202) 249-6423 | C: (703) 989-5269
www.americanchemistry.com

From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Monday, January 3, 2022 4:41 PM
To: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Subject: RE: Follow-up Items

Got it, thanks!

Andrew Bouchard
Environmental Engineer
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OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Sent: Tuesday, December 28, 2021 6:29 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: RE: Follow-up Items

Hi Andrew,

One change to the Formosa contact, incorporated below. Thanks again.

Regards,
Brendan

Brendan Mascarenhas | American Chemistry Council
Director, Regulatory and Technical Affairs
Brendan_Mascarenhas@americanchemistry.com
700 2nd Street NE | Washington, D.C. | 20002
O: (202) 249-6423 | C: (703) 989-5269
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From: Mascarenhas, Brendan
Sent: Tuesday, December 21, 2021 5:19 PM
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Subject: RE: Follow-up Items

Hi Andrew,

Hope all is well. As we discussed, please see attached for the HON facility list with some corrections from ACC members. We may have an additional item or two from some other companies that are not ACC members, i.e., Formosa Plastics. I have also included below some preliminary contacts for the companies you listed. We hope to get Sasol's contact soon, and I will keep you posted as we do. In the meantime, if you need anything else, please feel free to let me know. Thanks a lot.

- Dow Chemical Company
 - Contact: Russell Wozniak, wozniara@dow.com, (361) 553-2920
- Union Carbide Corporation
 - Contact: Russell Wozniak, wozniara@dow.com, (361) 553-2920

- Formosa Plastics Corporation USA
 - Contact: Rick Crabtree, rickc@ftpc.fpcusa.com, (361) 987-7280
- Eastman Chemical Company
 - Contact: Chris Moore, chris.moore@eastman.com, (865) 414-5061
- BASF Corporation
 - Contact: Daniel Wolf, daniel.wolf@basf.com, (225) 339-2774
- Sasol Chemicals (USA) LLC
 - Contact: TBD
- Indorama Ventures Oxides LLC
 - Contact: Kimberly Hoyt, kim.hoyt@us.indorama.net, (409) 723-3261
- Huntsman Petrochemical LLC
 - Contact: Scott Wagaman, scott_a_wagaman@huntsman.com, (281) 719-3038

Regards,
Brendan

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From: Bouchard, Andrew <Bouchard.Andrew@epa.gov>
Sent: Wednesday, December 8, 2021 10:58 AM
To: Mascarenhas, Brendan <Brendan_Mascarenhas@americanchemistry.com>
Subject: Follow-up Items

Hi Brendan

A couple of follow-up items for you. First, I wanted to check-in with you on the status of the facility list review to see when we might have comments back from you all? Second, for the eight entities we are planning to send the CAA section 114 request to, is there a preferred list of company contacts and their contact info (email and phone #) who we should address the requests to? As a reminder, the requests will be going to the following entities: The Dow Chemical Company, Union Carbide Corporation, Formosa Plastics Corporation USA, Eastman Chemical Company, BASF Corporation, Sasol Chemicals (USA) LLC, Indorama Ventures Oxides LLC, and Huntsman Petrochemical LLC.

Lastly, I'm attaching a copy of the OAR letter Elliott had inquired about getting a copy of at the meeting this morning.

Andrew Bouchard
 Environmental Engineer

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Phone: (919) 541-4036
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